

Andrew J. Breuner
LAW OFFICE OF ANDREW J. BREUNER
PO Box 603
Gallatin Gateway, Montana 59730
Telephone (406) 556-0255
Facsimile (406) 556-4654
Attorney for Defendant
Wade Lunnis

**MONTANA EIGHTEENTH JUDICIAL DISTRICT COURT
GALLATIN COUNTY**

STATE OF MONTANA,)	
)	
Plaintiff,)	
v.)	Case Nos. DC-13-20B
)	
WADE LUNNIS,)	HON. MIKE SALVAGNI
)	
Defendant.)	UNCONTESTED MOTION AMEND
)	CONDITIONS OF RELEASE

Defendant motions the Court for its order amending the conditional release order dated February 4, 2013 to indicate that the defendant be released on his own recognizance; report to Court Services immediately upon release from custody and be assigned to Level IV supervision/electronic monitoring; make contact with the Veterans Administration Montana Health Care System (Fort Harrison) within five business days of his release; secure an appointment for purposes of addressing chronic pain; and follow all recommendation of his providers.

Defendant is a Vietnam veteran. Defendant suffers from bilateral degenerative hip joint disease; bilateral osteoarthritis of the shoulders; left knee degeneration; lower spine herniated discs and degeneration; and peptic ulcer disease among other medical issues.

Defendant had a right hip arthroplasty/resurfacing in 2008 that per Martin Gelbke, M.D. of Bridger Orthopedic evidences "malunion" of an earlier acetabular fracture whose revision is "certainly not an easy operation and not a straightforward problem." (8 September 2011).

Medical management of these conditions at the detention center is limited and defendant is suffering from chronic pain.

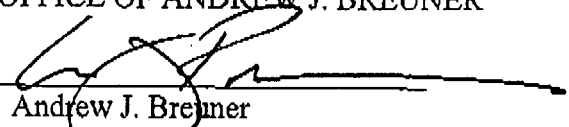
The undersigned has been in contact with the VA. Defendant is in the system and efforts are currently underway to secure VA housing near the Medical Center.

Special Assistant Attorney General Mike Winsor has been contacted and does not contest this motion.

Respectfully submitted this 5th day of April, 2013.

LAW OFFICE OF ANDREW J. BREUNER

By

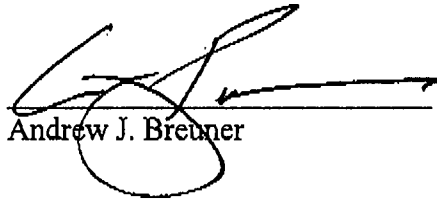

Andrew J. Breuner
Attorney for Defendant
Wade Lunnis

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the 5th day of April, 2013, I personally served true and correct copies of the foregoing document by (unless otherwise indicated) First-Class mail, postage pre-paid, and addressed to:

Mike Winsor
Special Assistant Attorney General
840 Helena Avenue
Helena, MT 59601

BY FACSIMILE (406) 444-3499



Andrew J. Breuner

Andrew J. Breuner
 LAW OFFICE OF ANDREW J. BREUNER
 PO Box 603
 Gallatin Gateway, Montana 59730
 Telephone (406) 556-0255
 Facsimile (406) 556-4654
 Attorney for Defendant
 Wade Lunnis

**MONTANA EIGHTEENTH JUDICIAL DISTRICT COURT
 GALLATIN COUNTY**

STATE OF MONTANA,)	
)	
Plaintiff,)	
v.)	Case Nos. DC-13-20B
)	
WADE LUNNIS,)	HON. MIKE SALVAGNI
)	
)	UNCONTESTED MOTION AMEND
Defendant.)	CONDITIONS OF RELEASE

Defendant motions the Court for its order amending the conditional release order dated February 4, 2013 to indicate that the defendant be released on his own recognizance; report to Court Services immediately upon release from custody and be assigned to Level IV supervision/electronic monitoring; make contact with the Veterans Administration Montana Health Care System (Fort Harrison) within five business days of his release; secure an appointment for purposes of addressing chronic pain; and follow all recommendation of his providers.

Defendant is a Vietnam veteran. Defendant suffers from bilateral degenerative hip joint disease; bilateral osteoarthritis of the shoulders; left knee degeneration; lower spine herniated discs and degeneration; and peptic ulcer disease among other medical issues.

Notice of Additional Filing
State v. Lunnis, W.
 Page 1 of 1

Job	704	05-Apr-2013 07:16 PM	Receive	406 582 1966	0:26	3	Success
Date/Time			Type	Identification	Duration	Pgs	Result

SAO Legal
 4064443497
 05-Apr-2013 07:17 PM

Fax Header Information

Fax Call Report

HP LaserJet M4345 MFP Series